



Jan 28 2008
3:50PM

1 EUGENE C. BLACKARD, ESQ. (State Bar No. 142090)
2 ARCHER NORRIS
3 A Professional Corporation
4 2033 N. Main Street, Suite 800
5 P. O. Box 8035
6 Walnut Creek, California 94596
7 (925) 930-6600
8
9 Attorneys for Defendant
10 GRAYBAR ELECTRIC COMPANY, INC.

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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN FRANCISCO

IN RE: No. 828684
COMPLEX ASBESTOS LITIGATION DEFENDANT GRAYBAR
ELECTRIC COMPANY, INC.'S
SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S STANDARD
INTERROGATORIES TO ALL
DEFENDANTS PURSUANT TO
GENERAL ORDER NO. 129

Defendant, GRAYBAR ELECTRIC COMPANY, INC. ("GRAYBAR") hereby supplements its responses to Plaintiff's Interrogatories pursuant to General Order No. 129 as follows. In responding to these interrogatories, responding party has provided such information as is presently available. However, discovery is continuing and responding party reserves the right to introduce such additional evidence or facts as later ascertained, and to present at trial further documentary or oral evidence for analysis not yet obtained or available.

INTERROGATORY NO. 1.:

IDENTIFY the person verifying these answers on YOUR behalf.

RESPONSE TO INTERROGATORY NO. 1:

Alice Lehnhoff
Corporate Counsel
34 North Meramec Avenue
Clayton, MO 63105

1 INTERROGATORY NO. 2:

2 State the date of first employment with YOU, and the dates and titles of each job position the person
3 verifying these interrogatories has held while employed by YOU.

4 **RESPONSE TO INTERROGATORY NO. 2:**

5 Legal Assistant from March, 1989 to April, 1992
6 Senior Legal Assistant II from April, 1992 to April, 1996
7 Senior Legal Assistant I from April, 1996 to June, 2004
8 Corporate Counsel from June, 2004 to present

9 INTERROGATORY NO. 3:

10 State whether or not YOU are a corporation, and if so, state:

- 11 A. YOUR correct corporate name.
12 B. YOUR state of incorporation.
13 C. The date of YOUR incorporation.
14 D. The address of YOUR principal place of business.
15 E. Whether or not YOU have ever held a certificate of authority to do business in the State of
16 California, and if so, the inclusive dates of any certificate.
17 F. If YOU are wholly owned or the majority interest of YOUR company is owned by another
18 business entity, state the entity's name and principal place of business.
19 G. Whether YOU have any business offices in California, and if so, YOUR principal place of
20 business in California.

21 **RESPONSE TO INTERROGATORY NO. 3:**

22 Yes.

- 23 A. Graybar Electric Company, Inc.
24 B. New York
25 C. December 11, 1925
26 D. 34 North Meramec Avenue, Clayton, Missouri
27 E. GRAYBAR has been qualified to do business in California since December 11, 1925
28 F. GRAYBAR is wholly owned by its employees and retirees
29 G. GRAYBAR has 21 branches in California. Each branch reports independently to corporate
30 offices in Missouri. GRAYBAR has no principal place of business in California.

31 Interrogatory No. 4:

32 Have YOU ever been identified, known, or done business under any other name in the State of
33 California?

1 **RESPONSE TO INTERROGATORY NO. 4:**

2 No.

3 **INTERROGATORY NO. 5:**

4 If your answer to Interrogatory No. 4 is in the affirmative, please state such name or names and the
5 time period during which THIS DEFENDANT was so known or identified.

6 **RESPONSE TO INTERROGATORY NO. 5:**

7 Not applicable

8 **Interrogatory No. 6:**

9 If YOU are not a corporation, what is YOUR business structure (Partnership, joint venture, sole
10 proprietorship, etc.).

11 **RESPONSE TO INTERROGATORY NO. 6:**

12 Not applicable.

13 **Interrogatory No. 7:**

14 If YOU are not a corporation, please IDENTIFY all persons or other entities with an ownership
15 interest in YOU.

16 **RESPONSE TO INTERROGATORY NO. 7:**

17 Not applicable.

18 **Interrogatory No. 8:**

19 If you are not a corporation, please state the following:

20 A. The address where the HISTORICAL RECORDS of THIS DEFENDANT ARE currently
located; and

21 B. The name, job title and current address of the Custodian for THIS DEFENDANT'S
HISTORICAL RECORDS.

22 As used herein, "HISTORICAL RECORDS" shall include all DOCUMENTS relating to the
formation of THIS DEFENDANT, all minutes of partners', general partners', or other owners' meetings, and
23 all DOCUMENTS this DEFENDANT'S merger with, acquisition of or purchase, or sale of or by any other
COMPANY.

24 **RESPONSE TO INTERROGATORY NO. 8:**

25 Not applicable.

26 **Interrogatory No. 9:**

27 IDENTIFY YOUR custodian of Business Records.
28

1 **RESPONSE TO INTERROGATORY NO. 9:**

2 Carrie Johnson
3 Director of Organizational Design & Development
4 11885 Lackland Road
5 St. Louis, MO 63146

6 Interrogatory No. 10:

7 IDENTIFY the person or persons most knowledgeable about:

- 8 A. YOUR acquisition of RAW ASBESTOS and/or ASBESTOS CONTAINING PRODUCTS;
9 B. YOUR use of RAW ASBESTOS and/or ASBESTOS CONTAINING PRODUCTS;
10 C. YOUR contracting with others to do work involving use of handling of RAW ASBESTOS
11 OR ASBESTOS CONTAINING PRODUCTS.

12 **RESPONSE TO INTERROGATORY NO. 10:**

13 David Maxwell
14 Vice President, Sales
15 c/o Archer Norris

16 Interrogatory No. 11:

17 For DEFENDANTS involved in the MARKETING of ASBESTOS-CONTAINING PRODUCTS,
18 state the IDENTITY of physicians, medical directors and/or industrial hygienists employed by YOU during
19 the time frame or prior to the time YOU discontinued the marketing of such products. All other
20 DEFENDANTS need only respond as to medical directors and/or industrial hygienists or physicians
21 employed in the area of employee health and safety. PREMISES owners and domestic corporations need
22 only respond as to the United States.

23 **RESPONSE TO INTERROGATORY NO. 11:**

24 None.

25 Interrogatory No. 12:

26 Has any employee of THIS DEFENDANT testified by deposition or at trial on behalf of THIS
27 DEFENDANT in a third-party case, in which THIS DEFENDANT was a party, wherein the plaintiff has
28 alleged an asbestos-related injury? If so, for each such third-party case (except that Premises Defendants and
Contractor Defendants need answer only with respect to cases relating to sites within the GEOGRAPHIC
AREA) please state:

- 29 A. the caption and case number
30 B. The court filing including state and county;
31 C. The date of deposition or trial testimony;
32 D. The name and address of plaintiff's counsel of record;
33 E. The name and address of the court reporter.

34 **RESPONSE TO INTERROGATORY NO. 12:**

35 Yes.

1 **Ralph L. Sackett** (deceased) testified by deposition in the following matters:

- 2 1. A. *Walberg v. Fibreboard*, Case No. 90-2-00223-5
3 B. Superior Court of Washington for Kitsap County
4 C. March 30, 1992
5 D. Schroeter, Goldmark & Bender, P.S., 500 Central Building, 810 Third Avenue,
6 Seattle, WA 98104
7 E. Venezia Reporting and Video Services, 1017 Olive Street, Suite L-2, St. Louis, MO
8 2. A. W.V. Civil Action 92-C-8888
9 B. Circuit Court of Kanawha County
10 C. August 31, 1993
11 D. Henderson & Goldberg, 1030 Fifth Avenue, Pittsburgh, PA 15219
12 E. Waller Reporting, Inc., 515 Olive Street, Suite 1506, St. Louis, MO 63101

13 **Kevin O'Rourke**

- 14 1. A. C.A. No. 93C-01-119; C.A. No. 94C-07-167; C.A. No. 94C-03-011; C.A. No. 94C-
15 01-49; CA 94C-12-12-274.
16 B. A court located in the State of Delaware
17 C. August 22, 1995
18 D. Jacobs & Crumplar, P.A., 2 East 7th Street, Wilmington DE 19801
19 E. Wilkes & McCall, Telephone Number (302) 426-1007

20 **Donald E. Lang**

- 21 1. A. *Pamela A. Ondik, et al. v. ACandS, Inc. et al.*, No. 00-2463
22 B. Commonwealth of Massachusetts, Middlesex, Superior Court Department
23 C. December 12, 2000
24 D. Law Office of Michael C. Shepard, P.C., 205 Portland Street, Boston, MA 02114
25 E. Eppley Court Reporting, P.O. Box 532, Ashland, MA 01721
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1 **David Maxwell**

- 2 1. A. *Alfred Todak v. Asbestos Defendants*, No. 320621
- 3 B. San Francisco Superior Court, State of California
- 4 C. January 10, 2002
- 5 D. Brayton Purcell, 222 Rush Landing Road, Novato, CA 94948
- 6 E. Tooker & Antz Court Reporting, 818 Mission Street, 5th Floor, San Francisco, CA
- 7 2. A. *Norman Hopkins v. Asbestos Defendants*, No. 408556
- 8 B. San Francisco Superior Court, State of California
- 9 C. May 9, 2003
- 10 D. Brayton Purcell, 222 Rush Landing Road, Novato, CA 94948
- 11 E. Aiken & Welch, One Kaiser Plaza, Suite 505, Oakland, CA
- 12 3. A. *Walter A. Cross v. Flintkote, et al.*, No. 00-CV-00117
- 13 B. In the Court of Common Pleas, Trumbull County, Ohio
- 14 C. August 30, 2006
- 15 D. Law Offices of Russell Smith, 503 Key Building, 159 South Main Street, Akron,
- 16 OH 44308
- 17 E. Premier Court Reporting, 3rd Floor, 80 South Summit Street, Akron, OH

18 **James Estis**

- 19 A. *Douglas W. Cochrane* (WD: Carol S. Cochrane), Case No. 03-09321-NP
- 20 *Ronald Shuster* (WD: Lorraine E. Shuster), Case No. 03-09320-NP
- 21 *Nicholas/Betsy Waswick*, Case No. 04-01852-NP
- 22 B. Circuit Court for the County of Shiawassee, State of Michigan
- 23 C. August 9, 2005
- 24 D. Goldberg, Persky & White, P.C., 4800 Fashion Square Boulevard, Suite 260,
- 25 Saginaw, Michigan 48604
- 26 E. Bienenstock Court Reporting & Video, www.bienenstock.com

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1 **Gerald G. Pollick**

- 2 A. *Robert Donlan and Paulette F. Donlan v. A.W. Chesterton, et al.*, Case No. 07-0774
- 3 B. Commonwealth of Massachusetts, Middlesex Superior Court
- 4 C. September 13, 2007
- 5 D. Coady Law Firm, 205 Portland Street – 5th Floor, Boston, MA/Simon Eddins &
- 6 Greenstone, LLP, 3232 McKinney Avenue, Suite 610, Dallas, TX
- 7 E. Eppley Court Reporting, LLC, P.O. Box 382, Hopedale, MA 01747

8 Interrogatory No. 13:

9 For each of the following, please state whether, at any time within the time frame or until such time

10 as any defendant which had been engaged in **MARKETING RAW ASBESTOS** or **ASBESTOS-**

11 **CONTAINING PRODUCTS** discontinued the **MARKETING** of such products, **THIS DEFENDANT** was a

12 member or paid dues for any representative of **THIS DEFENDANT** (excluding faculty members of

13 educational institutions) to be a member of the following:

- 14 A. American Conference of Governmental Industrial Hygienists;
- 15 B. American Industrial Hygiene Association;
- 16 C. American Petroleum Institute;
- 17 D. American Railroad Association;
- 18 E. Asbestos Cement Producers Association;
- 19 F. Asbestos Information Association (AIA)(please answer through date of your answers);
- 20 G. Asbestos Information Association/North American (AIA/NA)(please answer through date of
- 21 your answers);
- 22 H. Asbestos Textile Institute (ATT);
- 23 I. Industrial Hygiene Foundation and/or Industrial Health Foundation (IHF);
- 24 J. Industrial Mineral Insulation Manufacturers Institute;
- 25 K. Magnesia Insulation Manufacturers' Association;
- 26 L. Magnesia Silica Insulation Manufacturers Association;
- 27 M. Mineral Wool Institute;
- 28 N. National Insulation Manufacturers Association (NIMA);
- O. National Safety Council;
- P. New York Academy of Sciences;
- Q. Quebec Asbestos Mining Association (QAMA);
- R. Refractories Institute;
- S. Safe Building Alliance (please answer through date of your answers);
- T. Thermal Insulation Manufacturers Association (TIMA);
- U. U.S. Maritime Commission;
- V. IDENTIFY any other organization, associations or groups of manufacturers, miners,
- distributors, importers, labelers, suppliers, and/or sellers of **ASBESTOS-CONTAINING PRODUCTS** of
- which this **DEFENDANT** was a member;
- W. IDENTIFY any such representative of **THIS DEFENDANT**.

27 **RESPONSE TO INTERROGATORY NO. 13:**

28 A – V. No.

1 W. Not applicable.

2 Interrogatory No. 14:

3 For each organization, association or other entity identified in YOUR Response to Interrogatory No.
4 13, please state:

- 5 A. The dates during which THIS DEFENDANT was a member;
6 B. The name(s) of any publication(s) received by THIS DEFENDANT from such association
7 or organization;
8 C. The name of any committee or subcommittee of which THIS DEFENDANT was a member,
9 and the dates of such committee or subcommittee membership.

10 **RESPONSE TO INTERROGATORY NO. 14:**

11 Not applicable.

12 Interrogatory No. 15:

13 Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing results or
14 conclusions of any studies and/or tests conducted by Bonsib for Standard Oil of New Jersey relating to
15 asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so:

- 16 A. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
17 and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
18 describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for
19 production of documents.
20 B. State the date upon which THIS DEFENDANT first received such DOCUMENTS;
21 C. State the IDENTITY of the custodian of such DOCUMENTS.
22 D. This interrogatory does not apply to DOCUMENTS contained in a library maintained by a
23 DEFENDANT hospital or a DEFENDANT'S library providing access to the general public.

24 **RESPONSE TO INTERROGATORY NO. 15:**

25 No.

26 Interrogatory No. 16:

27 Had THIS DEFENDANT prior to 1973 received a copy or any portion of any studies and/or tests
28 conducted by any insurance company, including but not limited to Metropolitan Life Insurance Company
and Aetna Insurance relating to asbestos exposure in the workplace or the human health consequences of
exposure to asbestos? If so:

- A. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for
production of documents.
B. State the date upon which THIS DEFENDANT first received such DOCUMENTS;
C. State the IDENTITY of the custodian of such DOCUMENTS.
D. This interrogatory does not apply to DOCUMENTS contained in a library maintained by a
DEFENDANT hospital or a DEFENDANT'S library providing access to the general public.

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1 **RESPONSE TO INTERROGATORY NO. 16:**

2 No.

3 Interrogatory No. 17:

4 Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing results or
5 conclusions of any studies and/or tests conducted by any laboratory, including but not limited to, the Saranac
6 Laboratory relating to asbestos exposure in the workplace or the human health consequences of exposure to
asbestos? if so:

7 A. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its
8 subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe
such DOCUMENTS with sufficient particularity that they may be made the subject of a request for
9 production of documents.

10 B. State the date upon which THIS DEFENDANT first received such DOCUMENTS;

11 C. State the IDENTITY of the custodian of such DOCUMENTS.

12 D. This interrogatory does not apply to DOCUMENTS contained in a library maintained by a
DEFENDANT hospital or a DEFENDANT'S library providing access to the general public.

13 **RESPONSE TO INTERROGATORY NO. 17:**

14 No.

15 Interrogatory No. 18:

16 Had THIS DEFENDANT (except for a defendant that is an educational institution) prior to 1973 ever
17 maintained a library (or libraries) which contained books, articles, periodicals, journals, and/or reference
materials that related to the subjects of asbestos, industrial hygiene, medicine, safety and/occupational
18 disease. If so, state:

19 A. The date each such library was established;

20 B. The location of each such library;

21 C. The IDENTITY of each librarian or other person in charge of such library.

22 **RESPONSE TO INTERROGATORY NO. 18:**

23 No.

24 Interrogatory No. 19:

25 With the exception of OSHA compliance, had THIS DEFENDANT (except for a defendant that is
26 an educational institution) prior to 1980 exchanged DOCUMENTS or communicated with any person or
27 other COMPANY expressly regarding the results of tests and/or studies relating to asbestos exposure in the
workplace or the human health consequences of exposure to asbestos? if so, state:

28 A. Each person or COMPANY with whom the information was exchanged or to whom it was
communicated.

B. The date(s) of any such exchanges or communications;

C. The IDENTITY of the custodian of such DOCUMENTS.

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1 **RESPONSE TO INTERROGATORY NO. 19:**

2 No.

3 **Interrogatory No. 20:**

4 Has any employee or designee of THIS DEFENDANT testified as a representative of THIS
5 DEFENDANT before the Occupational Safety and Health Administration, the National Institute of
6 Occupational Safety and Health, or any committee or subcommittee of the United States Congress relating to
asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so, please
state:

- 7 A. The entity before whom such testimony was given
8 B. The date(s) and location(s) of such testimony;
9 C. The IDENTITY of the individual(s) who so testified;
10 D. Whether any DOCUMENTS were presented to the entity before which testimony was
given;
11 E. Whether copies of DOCUMENTS presented were retained by THIS DEFENDANT and, if
so, state the IDENTITY of the custodian of such DOCUMENTS.

12 **RESPONSE TO INTERROGATORY NO. 20:**

13 No.

14 **Interrogatory No. 21:**

15 Has THIS defendant (except for a defendant that is an educational institution) conducted, or caused
16 to be conducted, tests, and/or studies of ambient asbestos dust created during the manufacture, processing
and/or assembling for sale of ASBESTOS-CONTAINING PRODUCTS? If so, state:

- 17 A. Each manufacturing facility, including location and address, at which any such test and/or study was
conducted;
18 B. The date of each such test and/or study;
19 C. The individual(s) or entity conducting each such test and/or study;
20 D. Whether THIS DEFENDANT has any DOCUMENTS containing the results and/or
conclusions of each such study;
21 E. The IDENTITY of the custodian of such DOCUMENTS.

22 **RESPONSE TO INTERROGATORY NO. 21:**

23 No.

24 **Interrogatory No. 22:**

25 Has THIS DEFENDANT (except for a defendant that is an educational institution) conducted, or
26 caused to be conducted, any tests and/or studies on ambient asbestos dust levels at any location or job site
27 where ASBESTOS-CONTAINING PRODUCTS were installed, utilized or removed? If so, for the first 5
tests and/or studies, state:

- 28 A. The location, including name and address, at which each such test and/or study was
conducted.
B. The individual(s) or entity conducting each such test and/or study;
C. The date of each such test and/or study;
D. Whether THIS DEFENDANT has any DOCUMENTS containing the results and/or

conclusions of each such test and/or study;
E. The IDENTITY of the custodian of such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 22:

No.

INTERROGATORY NO. 23:

Did THIS DEFENDANT (except for a defendant that is an educational institution) have any laboratory or other similar type of facility anywhere in the United States at which it conducted, or caused to be conducted, any tests and/or studies of ASBESTOS-CONTAINING PRODUCTS or RAW ASBESTOS relating to the health consequences of asbestos or the dust generated by any use of asbestos or ASBESTOS-CONTAINING PRODUCTS. If so, state:

- A. The location, including name and address, at which each such test and/or study was conducted.
- B. The individual(s) or entity conducting each such test and/or study;
- C. The date of each such test and/or study;
- D. Whether THIS DEFENDANT has any DOCUMENTS containing the results and/or conclusions of each such test and/or study;
- E. The IDENTITY of the custodian of such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 23:

No.

INTERROGATORY NO. 24:

Has THIS DEFENDANT made available to its employees a medical examination program to determine the absence or presence of asbestos-related disease? If so, state:

- A. Whether chest x-rays or pulmonary function tests were part of such program(s);
- B. Whether participation in any such program was a mandatory condition of employment or was voluntary;
- C. Whether THIS DEFENDANT has DOCUMENTS of such program(s);
- D. The IDENTITY of the custodian of such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 24:

No.

INTERROGATORY NO. 25:

Prior to 1973, did any person file a Workers' Compensation claim for asbestos-related injury against THIS DEFENDANT or against any Workers' Compensation insurance carrier which provided coverage for THIS DEFENDANT? If so, state the total number of such claims and, for the first 20 such claims state:

- A. The date of such claim.
- B. The name of the claimant;
- C. The case number;
- D. The court in which the claim was filed;
- E. The IDENTITY of THIS DEFENDANT's custodian of DOCUMENTS evidencing such claims.

1 **RESPONSE TO INTERROGATORY NO. 25:**

2 No.

3 Interrogatory No. 26:

4 Does THIS DEFENDANT have insurance available to cover judgment(s) entered against it in
5 asbestos-related personal injury lawsuits? If so, state:

6 A. The name and principal place of business of any insurance carrier who has issued such
policy of insurance;

7 B. The number and effective date of each policy;

8 C. The amount(s) of coverage of each policy;

9 D. The applicable dates of coverage

10 **RESPONSE TO INTERROGATORY NO. 26:**

11 Yes. Royal Insurance Company

Years of Coverage	Carrier/Policy Number	Policy Limits (Occurrence/Annual Products Liability Aggregate)
12/31/64 – 12/31/65	RLG 098720	\$200,000/\$500,000
12/31/65 – 12/31/68	RLG 105640	\$200,000/\$500,000
12/31/68 – 12/31/71	PTG 606428	\$200,000/\$500,000
12/31/71 – 12/31/72	PTG 606421	\$200,000/\$500,000
12/31/72 – 12/31/73	PTG 606422	\$200,000/\$500,000
12/31/73 – 12/31/74	PTG 606423	\$200,000/\$500,000
12/31/74 – 12/31/75	PTG 606424	\$200,000/\$500,000
12/31/75 – 12/31/76	PTG 606425	\$200,000/\$500,000
12/31/76 – 12/31/77	PTG 606426	\$200,000/\$500,000
01/01/78 – 01/01/79	PTG 313041	\$200,000/\$500,000
01/01/79 – 01/01/80	PTG 313042	\$200,000/\$500,000 CSL
01/01/80 – 01/01/81	PTG 313043	\$200,000/\$500,000 CSL
01/01/81 – 01/01/82	PTG 313044	\$200,000/\$500,000 CSL
01/01/82 – 01/01/83	PLU 608890	\$200,000/\$500,000 CSL
01/01/83 – 01/01/84	PLU B77700	\$200,000/\$500,000 CSL
01/01/84 – 01/01/85	PLU B77700	\$200,000/\$500,000 CSL

22 Interrogatory No. 27:

23 State whether YOU have controlled, purchased, or in any way acquired any controlling interest in
24 any corporation or business entity which has mined, manufactured, produced, processed, compounded, sold,
25 supplied, distributed and/or otherwise placed RAW ASBESTOS or ASBESTOS-CONTAINING
PRODUCTS in the stream of commerce. If so, state:

26 A. The name and address of said corporation or business entity;

27 B. The dates YOU controlled, purchased or acquired any interest; and

28 C. The nature of the business as it pertains to asbestos.

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1 **RESPONSE TO INTERROGATORY NO. 27:**

2 No. GRAYBAR has not purchased the controlling interest in any corporation or other entity that
3 mined, manufactured, produced, processed, compounded, sold, supplied, distributed and otherwise placed
4 RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS in the stream of commerce.

5 Interrogatory No. 28:

6 State whether THIS DEFENDANT, between 1930 and 1985, has ever engaged in the following
7 activities with regard to RAW ASBESTOS, and if so, state the inclusive dates of such activity:

- 8 A. Mining;
9 B. Milling;
10 C. Supply;
11 D. Importing;
12 E. Processing;
13 F. Distribution;
14 G. Marketing;
15 H. Sale;
16 I. Brokering;

17 **RESPONSE TO INTERROGATORY NO. 28:**

18 No.

19 Interrogatory No. 29:

20 If YOUR answer to any of subparts of Interrogatory 28 regarding RAW ASBESTOS is in the
21 affirmative, state:

22 A. The trade, brand name, and/or generic name of such RAW ASBESTOS milled or
23 MARKETING in any form or quantity between 1930 and 1985:

24 B. the date(s) such RAW ASBESTOS was first placed on the market, including the date(s)
25 such RAW ASBESTOS was first marketed;

- 26 1. On an experimental basis;
27 2. On a test basis;
28 3. For sale.

29 C. The date(s) such Raw Asbestos:

- 30 1. Ceased to be produced; or
31 2. Was recalled from the market, if ever.

32 D. A description of the chemical composition of such RAW ASBESTOS, including the type
33 and/or grade of asbestos;

34 E. A description of the physical appearance and nature of such RAW ASBESTOS, including
35 any color coding, distinctive marking and/or logo on the packaging or container;

36 F. A detailed description of the intended use of such RAW ASBESTOS, including any
37 temperature limits for each such use;

38 G. Whether such RAW ASBESTOS was on the U.S. Government's "Qualified Products List,"
39 and if so, the inclusive dates it was on such list;

40 H. IDENTIFY to whom such RAW ASBESTOS has, at any time, been sold. As to each such,
41 state:

42 I. Whether any of THIS DEFENDANT'S RAW ASBESTOS has, at any time, been sold,

1 shipped, or otherwise distributed, used on installed to or at any COMPANY (including power company or
2 utility), governmental agency or entity, shipyard, distributor, refinery, contractor, supplier, PREMISE owner
3 or occupant, ship owner, or other PREMISE or site in the GEOGRAPHIC AREA and whether any of THIS
4 DEFENDANT's RAW ASBESTOS has at any time, been sold to any manufacturer, or manufacturing
5 facility, of ASBESTOS-CONTAINING PRODUCTS. If so, state:

- 6 1. The names of each such Company, governmental agency or entity, shipyard, distributor,
7 supplier, manufacturer or refinery;
- 8 2. The inclusive dates of each such sale, and the amount (quantity) and the trade brand name of
9 such RAW ASBESTOS sold;
- 10 3. The manner of shipment (e.g. boat, rail, etc.)
- 11 4. Whether you have any records indicating any such sale or shipment and, if so, the name,
12 address and job classification of each person who currently has possession of such records.
- 13 5. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
14 and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
15 describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for
16 production of documents.

17 **RESPONSE TO INTERROGATORY NO. 29:**

18 Not applicable.

19 Interrogatory No. 30:

20 Between 1930 and 1985, did YOU ever engage in any of the activities listed below with regard to
21 ASBESTOS-CONTAINING PRODUCTS? If so, state the inclusive dates of such activity:

- 22 A. Supply;
- 23 B. Importing;
- 24 C. Distribution;
- 25 D. Marketing;
- 26 E. Sale;
- 27 F. Labeling;
- 28 G. Manufacturing;
- H. Brokering.

RESPONSE TO INTERROGATORY NO. 30:

Yes. GRAYBAR distributed asbestos-containing products manufactured by others
beginning in 1926.

Interrogatory No. 31:

If YOUR answer to any of subparts of Interrogatory 30 regarding "ASBESTOS-CONTAINING
PRODUCTS" is in the affirmative, state:

A. The trade, brand name, and/or generic name of such ASBESTOS-CONTAINING
PRODUCT MARKETED in any form or quantity between 1930 and 1985:

B. The date(s) each such ASBESTOS-CONTAINING PRODUCT was first placed on the
market, including the date(s) each such ASBESTOS-CONTAINING PRODUCT was first MARKETED;

1. On an experimental basis;
2. On a test basis;
3. For sale.

C. The date(s) each such ASBESTOS-CONTAINING PRODUCT:

1. Ceased to be produced; or
 2. Was recalled from the market, if ever.
- D. A description of the chemical composition of each such ASBESTOS-CONTAINING PRODUCT, including the type and/or grade of asbestos and or asbestos fiber contained in each such product and the quantitative percentage of asbestos or asbestos fiber in each such product, and all non-asbestos components of the ASBESTOS-CONTAINING PRODUCT, and if the chemical composition changed over time, the inclusive dates of each formulation;
- E. A description of the physical appearance and nature of each such ASBESTOS-CONTAINING PRODUCT, including any color coding, distinctive marking and/or logo, either on the product or on the packaging;
- F. A detailed description of the intended use of each such ASBESTOS-CONTAINING PRODUCT, including any temperature limits for each such use;
- G. Whether any such ASBESTOS-CONTAINING PRODUCT was on the U.S. Government's "Qualified Products List," and if so, the inclusive dates it was on such list;
- H. The name and address of the supplier of the RAW ASBESTOS used in each such product and the time period of such supply;
- I. Whether any of THIS DEFENDANT'S RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS have, at any time, been sold, shipped, or otherwise distributed, to any COMPANY (including power company or utility), governmental agency or entity, shipyard, distributor, refinery, contractor, supplier, PREMISE owner or occupant, ship owner, or other PREMISE or site in the GEOGRAPHIC AREA. If so state:
1. The names of each such COMPANY, governmental agency or entity, shipyard, distributor, supplier, manufacturer, refinery, contractor, PREMISE owner or occupant, ship owner, PREMISE or site;
 2. The inclusive dates of each such sale, shipment, distribution, use or installation and the amount (volume) and the trade or brand name of each such ASBESTOS-CONTAINING PRODUCT sold;
 3. Whether you have any records indicating any such sale, shipment, distribution, use or installation and, if so, the name, address and job classification of each person who currently has possession of such records.
 4. Whether you have any records indicating any such sale or shipment and, if so, the name, address and job classification of each person who currently has possession of such records.
- J. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

RESPONSE TO INTERROGATORY NO. 31:

A - I. GRAYBAR is a distributor. It no longer has sufficient information upon which to fully answer this interrogatory. GRAYBAR locations keep sales invoices for six years and the current year pursuant to its retention policy. Records reflecting information for the years 1930 through 1985 have been discarded. As GRAYBAR is only a distributor, it does not know what form of asbestos may have been contained in any particular product or the name and address of the supplier of any raw asbestos that may have been used in each product.

F. GRAYBAR believes that within the applicable time period it distributed asbestos-containing products manufactured by others. Those products are identified in GRAYBAR catalogs identified as follows. These archival, fragile, one of a kind catalogs are available for review at GRAYBAR's corporate offices at 34 North Meramec Avenue, Clayton, Missouri upon reasonable notice by contacting GRAYBAR's Custodian of Records through its attorney-of-record, Archer Norris.

Catalog Number	Year of Issue	Number of Pages
100	1926	1085
101	1934	735
102	1941	1072
103	1948	1116
104	1952	1352
105	1958	1628
106	1967	1116
61	1961	214
62	1962	232
63	1963	236
25	1965	270
26	1966	242
27	1967	238
28	1969	256
29	1970	248
30	1971	248
31	1972	248
32	1973	238
33	1974	254
34	1975	240
35	1977	276
36	1979	326
37	1982	295

Interrogatory No. 32 (PREMISES DEFENDANTS only)

Did YOU install, remove, or handle or contract to have others install, remove, or handle RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS at any PREMISES in the GEOGRAPHIC AREA which PREMISES is at issue as to YOU in San Francisco Superior Court asbestos litigation a of the date of your answers to these interrogatories? If so:

A. IDENTIFY the PREMISES

B. For each of the PREMISES:

1. State the nature of your ownership or possessory interest;
2. State the inclusive date of that interest;
3. IDENTIFY the party from whom that interest was acquired.
4. IDENTIFY the party, if any, to whom that interest was transferred.

1 C. IDENTIFY every contract to which YOU were a party or of which you have knowledge
2 wherein the performance of such contract involved the installation, removal, disturbing or handling of any
3 RAW ASBESTOS OR asbestos-CONTAINING PRODUCTS at YOUR PREMISES. For each such
4 contract:

1. IDENTIFY the parties to the contract
2. Provide a general description and specific location of the work to be performed by
5 each party to the contract;
3. IDENTIFY and describe the NATURE of the RAW ASBESTOS or ASBESTOS-
6 CONTAINING PRODUCTS installed, removed, disturbed or handled in the performance of the contract;
4. State the dates of the contract and the dates of performance;

7 D. Except as provided in response to subpart (c), has any work other than routine maintenance
8 been done on or to the PREMISES that involved the installation, removal, disturbing or handling of RAW
9 ASBESTOS or ASBESTOS-CONTAINING PRODUCTS? If so, for each such instance:

1. State the inclusive dates of the work;
2. Provide a general description and specific location of the work;
3. State whether the work was done by YOU and/or YOUR employees;
4. IDENTIFY and describe the NATURE of the RAW ASBESTOS or ASBESTOS-
10 CONTAINING PRODUCTS installed, removed, handled or disturbed;
5. IDENTIFY from whom the RAW ASBESTOS OR ASBESTOS-CONTAINING
11 PRODUCTS were acquired.

12 E. Has any asbestos abatement effort been made at the PREMISES? If so, for each such effort:

1. IDENTIFY who did the work;
2. State the inclusive dates thereof;
3. State whether samples were taken, and, if the samples still exist, IDENTIFY the
14 custodian of the samples;
4. State whether any material was tested, and, if so, what were the results of each test;
5. IDENTIFY each test result with sufficient particularity for purposes of a request for
15 production of documents, or, in the alternative, attach a copy to YOUR answers to these interrogatories.

16 F. Except for insurance coverage litigation, have you filed suit against, or otherwise sought to
17 recover from, any person or entity for some or all of the cost of asbestos abatement or for the property
18 damage allegedly caused by the presence of RAW ASBESTOS or ASBESTOS-CONTAINING
19 PRODUCTS on the PREMISES identified in response to subpart (A) above? If so:

1. IDENTIFY the person or entity against whom YOU have filed suit or otherwise
20 sought to recover;
2. If YOU have filed suit, state the court in which the action was filed, the date on
21 which it was filed, IDENTIFY all Plaintiffs and Defendants and their counsel of record;
3. State whether or not the case has been resolved, and if so, what was the status or
22 disposition.

23 G. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
24 and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
25 describe such DOCUMENTS with sufficient particularity that they maybe made the subject or a request for
26 production of documents.

27 H. IDENTIFY the person(s) presently most knowledgeable about the information south in this
28 interrogatory or its subparts.

RESPONSE TO INTERROGATORY NO. 32:

Not applicable.

Interrogatory No. 33 (CONTRACTOR DEFENDANTS only)

At any time between 1930 and 1985, did YOU hold a contractor's license in the State of California?
If so:

A. IDENTIFY each license by type, date and number.
B. If on the date of your answers YOU are a defendant in four or more asbestos actions in San Francisco superior Court, IDENTIFY each job or contract that YOU performed (directly or through one or more subcontractors) during this time period for work in any PREMISES which is at issue as to YOU on such date, and in any PREMISES of 50,000 square feet or more in the GEOGRAPHIC AREA which job or contract involved installation, removal, disturbing or handling RAW ASBESTOS or ASBESTOS-containing products. (Alternatively, at your option, you may IDENTIFY each job or contract YOU performed (directly or through one or more subcontractors) during this time frame for all work, or for all work on PREMISES of 50,000 square feet or more, in the GEOGRAPHIC AREA.) as to each such job or contract:

1. IDENTIFY the location (including name of ship, if applicable) where the job or work was performed.
2. State the date of the contract or the inclusive dates of the work;
3. IDENTIFY the person or entity with whom you contracted;
4. State your job or contract number.

C. If on the date of your answers you are not a defendant in four or more asbestos actions in San Francisco Superior Court, IDENTIFY each job or contract that YOU performed (directly or through one or more subcontractors) during this time period for work in any PREMISES which is at issue as to YOU on such date. As to each such job or contract:

1. IDENTIFY the location (including name of ship, if applicable) where the job or work was performed;
2. State the date of the contract or the inclusive dates of the work;
3. IDENTIFY the person or entity with whom you contracted;
4. State your job or contract number.

RESPONSE TO INTERROGATORY NO. 33

Not applicable.

Interrogatory No. 34:

Did any of the distributors identified in your Answer to Interrogatory Nos. 29 and 31 above have an exclusive distributorship? If so, state the relevant time period.

RESPONSE TO INTERROGATORY NO. 34:

Not applicable.

Interrogatory No. 35:

If THIS DEFENDANT entered into any agreements for the rebranding of any ASBESTOS-CONTAINING PRODUCTS by THIS DEFENDANT for resale or distribution by another person or entity, describe each agreement's terms and the parties to said agreement, the duration of the agreement, and the name of each product(s) and/or material(s) covered by each such agreement.

RESPONSE TO INTERROGATORY NO. 35:

Responding party has made a reasonable and good faith effort to obtain the information by inquiry to other natural persons or organizations, except where the information is equally available to propounding

1 parties and responds that to the best of its knowledge, GRAYBAR did not enter into any rebranding
2 agreements.

3 Interrogatory No. 36:

4 If THIS DEFENDANT entered into any agreements for the rebranding of ASBESTOS-
5 CONTAINING PRODUCTS manufactured, sold, supplied or distributed by another person or entity for
6 resale or distribution by YOU, describe each of the agreements and the parties to said agreement, the terms,
the duration, and the names of each product(s) and/or material(s) covered by each such agreement.

7 **RESPONSE TO INTERROGATORY NO. 36:**

8 Not applicable.

9 Interrogatory NO. 37:

10 As to RAW ASBESTOS and to each such ASBESTOS-CONTAINING PRODUCT listed in YOUR
11 responses to Interrogatories No. 29 and 31 did DEFENDANT warn of the health hazards of asbestos? If so,
state for each such warning:

12 A. The content, size, color, and location; whether the warning appeared on the material and/or
13 on the container, and/or was placed on a tag; whether the warning was included in contracts; whether the
warning was included in advertising or other promotional materials.

14 B. State whether you have any photographs thereof;

15 C. The inclusive dates on which you used each such warning;

16 D. State all changes you made in such warnings and the dates of such changes; and

17 E. Identify the person most knowledgeable about your warnings and warning policy.

18 **RESPONSE TO INTERROGATORY NO. 37:**

19 No. GRAYBAR is only a distributor and not a manufacturer. GRAYBAR did not change the
20 manufacturer's packaging. If any warnings were on the packaging, the manufacturer(s) would have placed
21 the wording on packaging.

22 Interrogatory No. 38:

23 With respect to each of YOUR ASBESTOS-CONTAINING PRODUCTS, state whether THIS
24 DEFENDANT's name, a trademark, logos, color coding, or other identifying markings ever appeared on the
actual product itself. If so, IDENTIFY each such product, state when the practice to place such identifying
markings upon the product was begun and when it ended, if applicable, and describe in detail the pertinent
marking(s) and the purpose, if any, of such markings.

25 **RESPONSE TO INTERROGATORY NO. 38:**

26 Responding party has made a reasonable and good faith effort to obtain the information by inquiry to
27 other natural persons or organizations, except where the information is equally available to propounding
28 parties. It is possible that reels on which wire was shipped may have contained GRAYBAR's name for

1 shipping and identification purposes. There is no information available to confirm this method and practice
2 of identification for the time period 1930 through 1985.

3 Interrogatory No. 39:

4 Between the years 1930 to 1985, did THIS DEFENDANT purchase or otherwise acquire any
5 ASBESTOS-CONTAINING PRODUCT lines from another person or entity? If so, state for each such
6 purchase:

- 7 A. Date of purchase or acquisition;
- 8 B. Terms of purchase or acquisition agreement;
- 9 C. Either (1) attach all DOCUMENTS evidencing said acquisition or (2) attach disks
10 containing such data, or (3) describe such documents with sufficient particularity that they may be made the
11 subject of a request for production of documents.
- 12 D. Trade, brand, and/or generic name of each such product line so acquired;
- 13 E. Name of the person or entity from whom YOU purchased or acquired each such
14 ASBESTOS-CONTAINING PRODUCT line; and
- 15 F. Location of any manufacturing facilities so acquired, and the type of ASBESTOS-
16 CONTAINING PRODUCTS manufactured therein.

17 **RESPONSE TO INTERROGATORY NO. 39:**

18 As a distributor, GRAYBAR, purchased asbestos-containing products from various manufacturers
19 for retail distribution. Whether or not this type of purchase is considered acquiring "any ASBESTOS-
20 CONTAINING PRODUCT lines" is not clearly evident. The manufacturers of said products may be listed in
21 product catalogs previously identified in Response No. 31.

22 Interrogatory No. 40:

23 Between the years 1930 to 1985, did THIS DEFENDANT sell any ASBESTOS-CONTAINING
24 PRODUCT line to another person or entity? If so, state for each such sale:

- 25 A. Date of sale;
- 26 B. Terms of sales agreement;
- 27 C. Either (1) attach all DOCUMENTS evidencing said sale, or (2) attach disks containing such
28 data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a
request for production of documents.
- 29 D. Trade, brand, and/or generic name of each such product line sold;
- 30 E. Name of person or entity to whom you sold each such ASBESTOS-CONTAINING
31 PRODUCTS line; and
- 32 F. Location of any manufacturing facilities so sold, and the type of ASBESTOS-
33 CONTAINING PRODUCTS manufactured therein.

34 **RESPONSE TO INTERROGATORY NO. 40:**

35 Responding party incorporates by references its response to Interrogatory No. 39.

36 INTERROGATORY NO. 41:

1 IDENTIFY all brochures, pamphlets, catalogs or other advertising relating to ASBESTOS-
2 CONTAINING PRODUCTS and/or RAW ASBESTOS which THIS DEFENDANT manufactured, sold,
distributed or supplied from the year 1930 to 1985. For each such document, state:

- 3 A. A description of the document;
- 4 B. the year it was printed;
- 5 C. The period of time in which it was used;
- 6 D. The purpose of such documents;
- 7 E. Whether the documents or copies of said documents presently exist;
- 8 F. If said documents or copies still exist, where they are located; and
- 9 G. The IDENTITY of the custodian of such documents.

7 **RESPONSE TO INTERROGATORY NO. 41:**

8 Responding party incorporates by reference its response to Interrogatory No. 31, F.

9 Interrogatory No. 42:

10 State if YOU have or had within YOUR corporate or other business structure any CONTRACT
11 UNITS.

12 **RESPONSE TO INTERROGATORY NO. 42:**

13 No.

14 Interrogatory No. 43:

15 State whether or not any of YOUR CONTRACT UNITS installed and/or removed RAW
16 ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS in the GEOGRAPHIC AREA at any time
between 1930 and 1985. If so:

- 17 A. State the business addresses and name of the CONTRACT UNIT;
- 18 B. State the inclusive periods of time the CONTRACT UNITS were working in the
GEOGRAPHIC AREA;
- 19 C. State the name and address of each job site within the GEOGRAPHIC AREA and the dates
the CONTRACT UNIT worked at those job sites, and, IDENTIFY the RAW ASBESTOS and/or
ASBESTOS-CONTAINING PRODUCTS installed or removed on each occasion;
- 20 D. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
21 and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for
22 production of documents.

23 **RESPONSE TO INTERROGATORY NO. 43:**

24 Not applicable.

25 Interrogatory No. 44:

26 When do YOU contend that THIS DEFENDANT first became aware that there is an association
27 between asbestos exposure and disease in human beings?

28 **RESPONSE TO INTERROGATORY NO. 44:**

1 Responding party has made a reasonable and good faith effort to obtain the information requested by
2 inquiry to other natural persons or organizations, except where the information is equally available to
3 propounding parties and responds: GRAYBAR believes that it first became aware of the alleged association
4 between asbestos exposure and disease in human beings at the same time the general public became aware of
5 any such association sometime during the 1980's.

6 Interrogatory No. 45:

7 How do YOU contend that THIS DEFENDANT first became aware that there is an association
8 between asbestos exposure and disease in human beings.

9 **RESPONSE TO INTERROGATORY NO. 45:**

10 Responding party has made a reasonable and good faith effort to obtain the information requested by
11 inquiry to other natural persons or organizations, except where the information is equally available to
12 propounding parties and responds: GRAYBAR believes that it first became aware of the alleged association
13 between asbestos exposure and disease in human beings from articles or communications made available to
14 the general public sometime during the 1980's.

15 Interrogatory No. 46:

16 Either (1) attach all DOCUMENTS evidencing the information upon which YOUR contentions in
17 YOUR answers to Interrogatories No. 44 and No. 45 are based, or (2) attach disks containing such data, or
18 (3) describe such documents with sufficient particularity that they may be made the subject of a request for
19 production of documents.

20 **RESPONSE TO INTERROGATORY NO. 46:**

21 GRAYBAR has no such documents.

22 Interrogatory No. 47:

23 When did THIS DEFENDANT first warn its employees that exposure to asbestos could be
24 hazardous to human health? State:

- 25 A. Whether the first such warning was written or oral;
26 B. Whether copies of DOCUMENTS containing such warning exist;
27 C. The IDENTITY of the custodian of such DOCUMENTS;
28 D. The content of the warning.

RESPONSE TO INTERROGATORY NO. 47:

Responding party has made a reasonable and good faith effort to obtain the information requested by

inquiry to other natural persons or organizations, except where the information is equally available to propounding parties and responds: to its knowledge, GRAYBAR did not warn its employees as to the hazards of asbestos exposure.

Interrogatory No. 48:

Did THIS DEFENDANT ever issue a written COMPANY policy discontinuing warning its employees that exposure to asbestos could be hazardous to human health? If so,

- A. Provide the date;
- B. Describe the circumstances; and
- C. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

RESPONSE TO INTERROGATORY NO. 48:

No.

Interrogatory No. 49:

Did THIS DEFENDANT provide any Independent Contractor or Subcontractor within the GEOGRAPHIC AREA with a written warning that exposure to asbestos could be hazardous to human health.

RESPONSE TO INTERROGATORY NO. 49:

Responding party has made a reasonable and good faith effort to obtain the information requested by inquiry to other natural persons or organizations, except where the information is equally available to propounding parties and responds: GRAYBAR would have passed on any warnings issued with the product by the manufacturer. GRAYBAR, however, would not have issued any writings of its own.

Interrogatory No. 50:

Has THIS DEFENDANT been cited for or otherwise charged by a public agency with a violation in the GEOGRAPHIC AREA of any statute, ordinance, safety order, regulation, or law pertaining to asbestos exposure? For each occasion, IDENTIFY:

- A. The code section, safety order, statute, or regulation for which THIS DEFENDANT had been cited or otherwise charged;
- B. The date(s) thereof.
- C. The agency or other governmental unit which issued the citation or otherwise charged YOU.
- D. All persons known to YOU with information relevant to the incident.
- E. What was the ultimate resolution.

RESPONSE TO INTERROGATORY NO. 50:

1 No.

2 Interrogatory No. 51:

3 If this DEFENDANT has ever owned or operated a railroad, state:

4 A. The IDENTITY of each such railroad, including the name(s) of such railroad during the
time period of YOUR ownership and/or operation, the principal place of business of such railroad and the
5 dates of YOUR ownership and/or operation;

6 B. The geographic area of operation of such railroad;

7 C. The name(s) of such railroad prior to YOUR ownership and/or operation;

8 D. The IDENTITY of the person or entity from whom YOU purchased your ownership or
operating interest, and the date of such purchase;

9 E. The IDENTITY of the person or entity to whom YOU sold your ownership or operating
interest, and the date of such sale.

10 F. Whether copies of DOCUMENTS evidencing your ownership/operation and/or sale exist;

11 G. The IDENTITY of the custodian of such DOCUMENTS;

12 H. To the extent that information has not been given in answers to Interrogatory Nos. 32 and
33, the information requested in Interrogatory Nos. 32 and 33, for each railroad owned or operated by YOU.

13 **RESPONSE TO INTERROGATORY NO. 51:**

14 No.

15 Interrogatory No. 52:

16 If DEFENDANT has ever owned or operated a shipyard, state:

17 A. The IDENTITY of each such shipyard, including the name(s) of such shipyard during the
time period of YOUR ownership and/or operation, the place of business of such shipyard and the dates of
YOUR ownership and/or operation;

18 B. the name(s) of such shipyard prior to YOUR ownership and/or operation;

19 C. The IDENTITY of the person or entity to whom YOU sold your ownership or operating
interest, and the date of such sale;

20 D. Whether copies of DOCUMENTS evidencing your ownership/operation and/or sale exist;

21 E. Whether any representative of THIS DEFENDANT attended the Maritime Commission
Conference in December 1942 in Chicago, Illinois? If so, IDENTIFY any such representative of THIS
DEFENDANT;

22 F. The IDENTITY of the Custodian of such DOCUMENTS;

23 G. To the extent that information has not been given in answers to Interrogatory No. 32, the
information requested in Interrogatory No. 32, for each shipyard owned or operated by YOU.

24 **RESPONSE TO INTERROGATORY NO. 52:**

25 Not applicable. GRAYBAR has never owned or operated a shipyard.

26 Interrogatory No. 53:

27 At any time between 1930 and 1985, did you import, export, ship, transship or otherwise transport
RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS into, out of or through any port in the
GEOGRAPHIC AREA? If so, for each occasion:

28 A. IDENTIFY and describe the NATURE and amount of RAW ASBESTOS and/or
ASBESTOS-CONTAINING PRODUCTS;

1 B. IDENTIFY the ship or ships (including the owners and operators thereof) onto or from
2 which the RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS were loaded, unloaded or
transshipped;

3 C. State the dates, port and pier involved for each occasion;

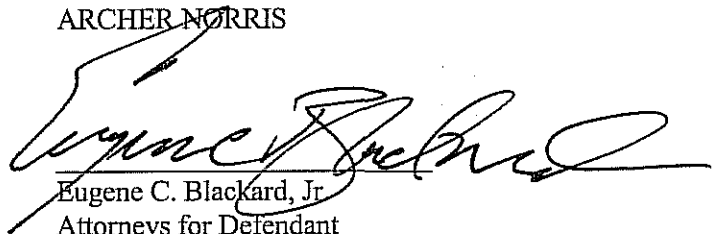
4 D. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
5 describe such DOCUMENTS with sufficient particularity that they may be made subject of a request for
production of documents.

6 **RESPONSE TO INTERROGATORY NO. 53:**

7 No.

8 DATED: January 28, 2008

ARCHER NORRIS

9
10 
11 Eugene C. Blackard, Jr.
Attorneys for Defendant
12 GRAYBAR ELECTRIC COMPANY, INC.

1 *IN RE: COMPLEX ASBESTOS LITIGATION*
2 San Francisco Superior Court Action No. 828684

3
4 VERIFICATION

5 I have read the foregoing DEFENDANT GRAYBAR ELECTRIC COMPANY, INC.'S
6 SUPPLEMENTAL RESPONSES TO PLAINTIFF'S STANDARD INTERROGATORIES TO ALL
7 DEFENDANTS PURSUANT TO GENERAL ORDER NO. 129 and know its contents.

8 I am a party to this action. The matters stated in it are true of my own knowledge
9 except as to those matters which are stated on information and belief, and as to
10 those matters I believe them to be true.



12 I am Corporate Counsel of Graybar Electric Company, Inc., a party to this action,
13 and am authorized to make this verification for and on its behalf, and I make this
14 verification for that reason. I have read the foregoing document(s). I am
15 informed and believe and on that ground allege that the matters stated in it are
16 true.

17 I am one of the attorneys of record for Defendant, a party to this action. Such
18 party is absent from the county in which I have my office, and I make this
19 verification for and on behalf of that party for that reason. I have read the
20 foregoing document(s). I am informed and believe and on that ground allege that
21 the matters stated in it are true.

22 Executed at Clayton, Missouri on this 28th day of January, 2008.

23 I declare under penalty of perjury under the laws of the State of Missouri that the
24 foregoing is true and correct.

25 
26 Alice Lehnhoff

1 **PROOF OF SERVICE**

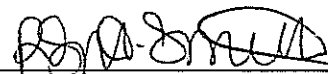
2 **Name of Action: In Re: Complex Asbestos Litigation**
3 **Court and Action No: San Francisco Superior Court Action No. 828684**

4 I, Rakia V. Grant-Smith, declare that I am over the age of eighteen years and not a party to
5 this action or proceeding. My business address is 2033 North Main Street, Suite 800, PO Box 8035,
6 Walnut Creek, California 94596-3728. On January 28, 2008, I caused the following document(s) to
7 be served:

8 **DEFENDANT GRAYBAR ELECTRIC COMPANY, INC.'S SUPPLEMENTAL RESPONSES**
9 **TO PLAINTIFF'S STANDARD INTERROGATORIES TO ALL DEFENDANTS PURSUANT**
10 **TO GENERAL ORDER NO. 129**

- 11 ☐ by placing a true copy of the document(s) listed above, enclosed in a sealed envelope,
12 addressed as set forth below, for collection and mailing on the date and at the business
13 address shown above following our ordinary business practices. I am readily familiar with
14 this business' practice for collection and processing of correspondence for mailing with the
15 United States Postal Service. On the same day that a sealed envelope is placed for
16 collection and mailing, it is deposited in the ordinary course of business with the United
17 States Postal Service with postage fully prepaid.
- 18 ☐ by having a true copy of the document(s) listed above transmitted by facsimile to the
19 person(s) at the facsimile number(s) set forth below before 5:00 p.m. The transmission
20 was reported as complete without error by a report issued by the transmitting facsimile
21 machine.
- 22 ☐ by having personally delivered a true copy of the document(s) listed above, enclosed in a
23 sealed envelope, to the person(s) and at the address(es) set forth below.
- 24 ☐ by having personal delivery by _____ of a true copy of the document(s) listed
25 above, enclosed in a sealed envelope, to the person(s) and at the address(es) set forth
26 below.
- 27 ☐ by placing a true copy of the document(s) listed above, in a box or other facility regularly
28 maintained by _____, an express service carrier, or delivered to a courier or driver
authorized by the express service carrier to receive documents, in an envelope designated
by the express service carrier, with delivery fees paid or provided for, addressed as set
forth below.
- ☒ I electronically served the above referenced document(s) through LEXIS NEXIS. E-
service in this action was completed on all parties listed on the service list with LEXIS
NEXIS. This service complies with the court's order in this case.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January
28, 2008, at Walnut Creek, California.



Rakia V. Grant-Smith



Sep 5 2008
12:33PM

1 *IN RE: COMPLEX ASBESTOS LITIGATION*
2 San Francisco Superior Court Action No. 828684

3 AMENDED VERIFICATION

4 I have read the foregoing DEFENDANT GRAYBAR ELECTRIC COMPANY, INC.'S
5 SUPPLEMENTAL RESPONSES TO PLAINTIFF'S STANDARD INTERROGATORIES TO ALL
6 DEFENDANTS PURSUANT TO GENERAL ORDER NO. 129 and know its contents.

7 I am a party to this action. The matters stated in it are true of my own knowledge
8 except as to those matters which are stated on information and belief, and as to
9 those matters I believe them to be true.



11 I am Corporate Counsel of Graybar Electric Company, Inc., a party to this action,
12 and am authorized to make this verification for and on its behalf, and I make this
13 verification for that reason. I have read the foregoing document(s). I am informed
14 and believe and on that ground allege that the matters stated in it are true.

15 I am one of the attorneys of record for Defendant, a party to this action. Such
16 party is absent from the county in which I have my office, and I make this
17 verification for and on behalf of that party for that reason. I have read the
18 foregoing document(s). I am informed and believe and on that ground allege that
19 the matters stated in it are true.

20 Executed at Clayton, Missouri on this 25th day of August, 2008.

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct.

23 Alice K. Lehnhoff
24 Alice Lehnhoff

1 **PROOF OF SERVICE**

2 **Name of Action: In Re: Complex Asbestos Litigation**
3 **Court and Action No: San Francisco Superior Court Action No. 828684**

4 I, Rakia V. Grant-Smith, declare that I am over the age of eighteen years and not a party to
5 this action or proceeding. My business address is 2033 North Main Street, Suite 800, Walnut
6 Creek, California 94596-3759. On September 5, 2008, I caused the following document(s) to be
7 served: **AMENDED VERIFICATION RE: DEFENDANT GRAYBAR ELECTRIC
8 COMPANY INC.'S SUPPLEMENTAL RESPONSES TO PLAINTIFF'S STANDARD
9 INTERROGATORIES TO ALL DEFENDANTS PURSUANT TO GENERAL ORDER
10 NO. 129**

- 11 ☐ by placing a true copy of the document(s) listed above, enclosed in a sealed envelope,
12 addressed as set forth below, for collection and mailing on the date and at the business
13 address shown above following our ordinary business practices. I am readily familiar
14 with this business' practice for collection and processing of correspondence for
15 mailing with the United States Postal Service. On the same day that a sealed envelope
16 is placed for collection and mailing, it is deposited in the ordinary course of business
17 with the United States Postal Service with postage fully prepaid.
- 18 ☐ by having a true copy of the document(s) listed above transmitted by facsimile to the
19 person(s) at the facsimile number(s) set forth below before 5:00 p.m. The transmission
20 was reported as complete without error by a report issued by the transmitting facsimile
21 machine.
- 22 ☐ by having personally delivered a true copy of the document(s) listed above, enclosed in
23 a sealed envelope, to the person(s) and at the address(es) set forth below.
- 24 ☐ by having personal delivery by _____ of a true copy of the document(s)
25 listed above, enclosed in a sealed envelope, to the person(s) and at the address(es) set
26 forth below.
- 27 ☐ by placing a true copy of the document(s) listed above, in a box or other facility
28 regularly maintained by _____, an express service carrier, or delivered to a
courier or driver authorized by the express service carrier to receive documents, in an
envelope designated by the express service carrier, with delivery fees paid or provided
for, addressed as set forth below.
- ☒ I electronically served the above referenced document(s) through LEXIS NEXIS. E-
service in this action was completed on all parties listed on the service list with LEXIS
NEXIS. This service complies with the court's order in this case.

29 I declare under penalty of perjury that the foregoing is true and correct. Executed on
30 September 5, 2008, at Walnut Creek, California.

31 
32 _____
33 Rakia V. Grant-Smith